

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DEDRA DE LA ROSA,

*Plaintiff,*

vs.

597 BROADWAY DEVELOPMENT CORP.

*Defendant.*

**ECF Case**

**No. 13-CIV-7999 (LAK) (MHD)**

**DECLARATION OF ELIZABETH  
WOLSTEIN  
IN OPPOSITION TO  
PLAINTIFF'S SUMMARY  
JUDGMENT MOTION**

Pursuant to 28 U.S.C. § 1746, Elizabeth Wolstein declares, under penalty of perjury, that the following is true and correct:

1. I am a member of Schlam Stone & Dolan LLP, counsel to Defendant 597 Broadway Development Corp. (“Defendant” or the “Landlord”) in the above captioned action. I submit this Declaration in opposition to Plaintiff’s motion for summary judgment. The matters set forth below are based upon my personal knowledge.
2. Attached hereto as Exhibit A is a true copy of a Stipulation Withdrawing Plaintiff’s First and Sixth Causes of Action and Other Claims, dated May 28, 2014, and so-ordered by this Court on June 4, 2014.
3. Attached hereto as Exhibit B is Plaintiff’s amended complaint in this action.

Executed: New York, New York, December 19, 2014

/ Elizabeth Wolstein